

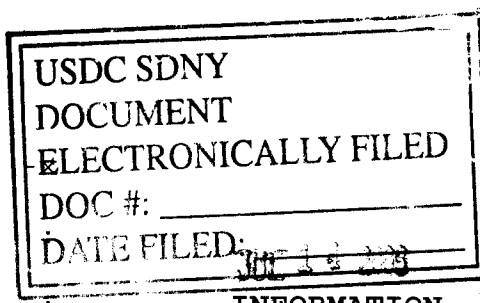
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

TANYA HOLLANDER,
a/k/a "Tania Hollander,"

Defendant.



INFORMATION

08 Crim - 638
JUDGE BA

COUNT ONE

The United States Attorney charges:

1. From in or about May 2007, through and including on or about March 6, 2008, in the Southern District of New York and elsewhere, TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Section 1952(a)(3) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, and others known and unknown, would and did use and cause to be used facilities in interstate commerce, to wit, cellular telephones and e-mail, with intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, to wit, a business enterprise involving prostitution offenses in violation of applicable State law, and thereafter did perform and attempt to

perform an act to promote, manage, establish, and carry on and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

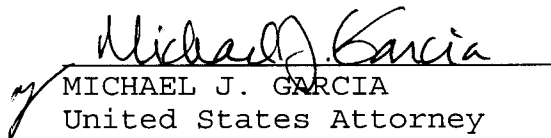
a. From in or about December 2004 through in or about at least January 2008, a co-conspirator not named as a defendant herein ("CC-1") received applications from women seeking to work as prostitutes with a prostitution business (hereinafter, the "Emperors Club") at various e-mail accounts;

b. On or about August 5, 2007, TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, spoke with a client of the Emperors Club over the telephone about arranging for a prostitute to meet that client at a hotel in New York, New York;

c. On or about January 28, 2008, TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, met with CC-1 and another co-conspirator not named as a defendant herein ("CC-2") in the vicinity of Grand Central Terminal in New York, New York, to discuss the business of the Emperors Club;

d. On or about January 31, 2008, TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, sent CC-1 a text message over the telephone informing CC-1 that HOLLANDER had scheduled a date for an Emperors Club client with an Emperors Club prostitute in Europe.

(Title 18, United States Code, Section 371.)


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INFORMATION

08 Cr.

(18 U.S.C. § 371.)

MICHAEL J. GARCIA
United States Attorney.
